

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Chapter 13
)	
WAVER CAMPBELL and)	Bankruptcy No. 23-13851-mdc
DEBORAH CAMPBELL,)	
)	
Debtors)	

ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE THAT TD BANK, N.A. (“**TD Bank**”), pursuant to Fed. R. Bankr. P. 2002, 3017 and 9007 and 11 U.S.C. §342, requests that copies of all notices, pleadings and papers given, transmitted, served and filed in this case be given, transmitted and served or filed upon Lesavoy Butz & Seitz LLC at the following address:

Jack M. Seitz, Esquire
Lesavoy Butz & Seitz LLC
1620 Pond Road, Suite 200
Allentown, PA 18104-2255
Phone: (610) 530-2700
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers specified in the bankruptcy rules and statutes referenced above, but also includes, without limitation, any notices, applications, motions, objections, pleadings, complaints, demands, replies, answers, reports, requests, plans, disclosure statements (including any documents, agreements, instruments and exhibits related to any plan or disclosure statement), petitions, schedules, statements, amendments, exhibits or modifications to all of the above, whether formal or informal, written or oral, whether transmitted or conveyed by any means, including, without limitation, mail, delivery, telegraph, telex, telephone, facsimile, e-mail or otherwise transmitted, conveyed, given, issued or filed with regard to the above-referenced case and proceeding.

PLEASE TAKE FURTHER NOTICE that this request for notices and papers shall not be deemed or construed to be an appearance in this case or a waiver of any substantive or procedural right of TD Bank, including, without limitation, to: (i) require that any proceeding that has to be initiated by complaint against TD Bank be initiated in an appropriate state or federal district court of competent jurisdiction; (ii) require that when any proceeding is to be initiated against TD Bank under applicable law, service shall be made on TD Bank in accordance with such law and that service upon undersigned counsel is insufficient for such purposes; (iii) the extent that federal jurisdiction obtains in any proceeding initiated against TD Bank, have final orders in non-core matters entered only after de novo review by the appropriate federal district court; (iv) have any trial by jury and any proceedings so triable in this case or in any case, controversy or proceeding under applicable law; (v) to the extent federal jurisdiction obtains in the United States District for the Eastern District of Pennsylvania, have the District Court

withdraw the reference in respect of any matters subject to mandatory or discretionary withdrawal; or (vi) assert other rights, claims, actions, defenses, setoffs or recoupments to which TD Bank is or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs or recoupments TD Bank expressly reserves.

Dated: January 23, 2024

LESAVOY BUTZ & SEITZ LLC

/s/Jack M. Seitz

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